

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: PET FOOD PRODUCTS LIABILITY LITIGATION	Hon. Noel L. Hillman Civil No. 07-2867 (NLH/AMD) MDL Docket No. 1850 <u>ALL CASES</u>
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**NOTICE OF JOINT MOTION FOR STAY OF
MDL PROCEEDINGS TO ALLOW FOR MEDIATION**

PLEASE TAKE NOTICE that on September 26, 2007, or on such other date and time as the Court shall designate, the undersigned attorneys for the parties shall jointly apply to the United States District Court for the District of New Jersey, at the Mitchell H. Cohen U.S. Courthouse, Camden, New Jersey, for an Order staying proceedings (other than those related to defendants' application regarding preservation of samples of recalled product, the appointment of lead and liaison counsel and the filing of an amended consolidated complaint) in MDL-1850 and all cases designated as member cases of MDL-1850 for ninety (90) days to allow the parties to engage in voluntary non-binding mediation to attempt to reach a global resolution of the entire case.

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CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of September 2007 a true and correct copy of the foregoing was served on all parties via the UNITED STATES DISTRICT COURT ELECTRONIC FILING SERVICE.

/s/ Mark C. Goodman
Mark C. Goodman
SQUIRE, SANDERS & DEMPSEY L.L.P.